

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: **Beverly Bradley** : CHAPTER: 13
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:
DEBTOR : BANKRUPTCY NO.: **17-18326/MDC**

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**AMENDED MOTION TO MODIFY
DEBTOR'S CHAPTER 13 PLAN AFTER
CONFIRMATION**

The motion to modify of the above-named Debtors, respectfully represents:

1. This case was commenced by the filing on **December 10, 2017**, a voluntary petition for relief under Chapter 13 of Title 11 of the United States Code.
2. William Miller, Esquire has been appointed Chapter 13 Trustee.
3. Debtor's modified plan was confirmed **December 13, 2017**.
4. Debtor's has paid the sum of **\$23,600.00** into the plan.
5. Debtor requests permission to modify said plan.
6. **Debtor income has been negatively impacted by the uncertainty of the pandemic outbreak. Debtor had part-time position as church organist. Employment has been suspended due to pandemic.**
7. Debtor proposes to adjust their post confirmation plan payments by adding a term of 24 months unto the end of his confirmed plan.
8. Therefore, Debtor request permission to modify their plan accordingly.

WHEREFORE, Debtor moves that this Honorable Court enter an Order granting Debtor's Motion to Modify Plan Post Confirmation.

Date: **August 10, 2020**

\s\ Michael D. Sayles
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